

AO 91 (Rev. 11-15-13) Criminal Complaint

~~United States District Court~~  
~~Southern District of Texas~~  
FILED

APR 12 2017

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

**SEALED**

**Clerk of Court**

United States of America

v.

Richard Leon Castillo  
(1991, USC)

Case No. M-17-0680-M

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2016 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 USC § 1001

*Offense Description*

Materially false statements

This criminal complaint is based on these facts:

On December 1, 2016, Richard Castillo made multiple false statements in the course of an interview with Drug Enforcement Administration Agents.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

4/12/2017

City and state:

McAllen, Texas

  
Complainant's signature

Jonathan Beyer, Special Agent

Printed name and title

  
Judge's signature

US Magistrate Judge  
Printed name and title

## **ATTACHMENT A**

On August 27, 2016, the San Juan Police Department received a 911 call regarding an accident at Moore Road and South Stewart Road in San Juan, Texas. Upon arrival, San Juan Police Officers and US Border Patrol Agents discovered what appeared to be a single vehicle accident. The vehicle was abandoned in an orchard. A search of the vehicle revealed two duffel bags containing bundles wrapped in black and gray tape, which appeared to be narcotics. The bundles were secured in the rear of San Juan Officer Salvador HERNANDEZ's marked SJPd unit. Multiple Border Patrol Agents along with Officer HERNANDEZ and SJPd Sergeant Rolando GARCIA conducted a search of the orchard for the abandoned vehicle's driver. After the search had commenced, SJPd Officer Richard CASTILLO arrived to assist. The driver was ultimately not located and the search was subsequently concluded. Thereafter, HERNANDEZ transported the bundles to the SJPd station where they were logged into evidence.

On December 1, 2016, Drug Enforcement Administration Agents, who were conducting an ongoing narcotics investigation, interviewed Officer CASTILLO regarding the events on August 27, 2016. During the interview, CASTILLO proceeded to make multiple false statements, including that he was not aware of who had maintained custody of the narcotics after the narcotics were seized at the location on Stewart Road on August 27, 2016, that he did not know who transported the narcotics from the location on Stewart Road to San Juan Police Department, and that he did not observe the bundles containing the narcotics prior to the bundles arriving at the San Juan Police Department station.

Subsequent to the interview on December 1, 2016, Agents obtained video footage, which showed that the statements previously made by CASTILLO were false. Specifically, the video showed that CASTILLO knew HERNANDEZ had custody of the bundles, was transporting the bundles, and that both CASTILLO and HERNANDEZ viewed the bundles prior to HERNANDEZ transporting them to the station. Agents also interviewed HERNANDEZ who provided statements that contradicted the statements made by CASTILLO.